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August 24, 2015

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The Honorable Rya Zobel
United States District Court
Joseph Moakley Courthouse
1 Courthouse Way
Boston, MA 02210

Re: Fungal Meningitis Issue; Motions to Withdraw

Dear Judge Zobel:

I hope this finds you well. We have seen several motions to withdraw granted. Ours remain pending. We would like to clarify the situation regarding these fully briefed motions that were not ruled upon at either the June 24 or August 5, 2015 case management conferences. The Docket numbers are 1936 and 1979. At the hearing on August 5 you indicated you would look at them in light of your other rulings.

We filed the Tucker Ellis withdrawal motion on June 5, 2015, and the Tucker, Saltzman motion was filed on June 17. The Motions comply with all ethical and rule requirements. There have been no objections, although the Tennessee defendants filed a "response" urging Ameridose be compelled to identify a contact person. (Docket #2001) We told them, both on and off the record on June 24, who the statutory agent was, thus satisfying their request. They then withdrew their "response." (Docket #2013) Your Honor granted the Ameridose (and others') motion for protective order, blocking various parties' efforts to depose owners or a 30(b)(6) representative of Ameridose. (Docket #2123) Finally, there is no impediment to the prompt dismissal of all cases against Ameridose, given the Court's show cause order on the request for dismissals (Docket # 1992) and the overruling of the only objection to dismissals. (Docket #2088) The New Jersey Defendants, the PSC and the Post-Confirmation Officer have submitted an acceptable entry paving the way for all the cases against Ameridose (and the other settling defendants) to be dismissed. (Docket 2178) Thus, all the cases will be dismissed shortly, there are no pending, unanswered discovery requests directed at Ameridose, there are no other motions pending affecting Ameridose, and there are no objections to the withdrawal from either the client or anyone else.

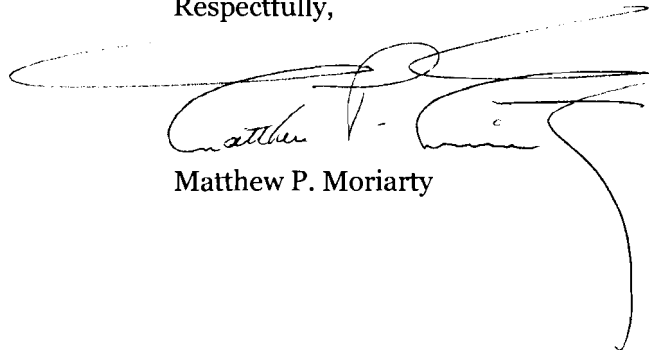
We respectfully request that our motion be granted as soon as possible, or upon the commencement of dismissals pursuant to the plans submitted to the Court.

Thank you very much for your time and consideration.

**Tucker
Ellis** | LLP

August 24, 2015
Page 2

Respectfully,

A handwritten signature in black ink, appearing to read "Matthew P. Moriarty", with a long, sweeping horizontal line extending to the right.

Matthew P. Moriarty

MPM/nkg

cc: Kristen Johnson
Dan Rabinovitz
Chris O'Hara
Michele Peirce
Scott Tucker